

LINCOLN OFFICE  
SUITE 500  
301 SOUTH 13TH STREET  
LINCOLN, NEBRASKA 68508-2578  
TELEPHONE 402-437-8500  
FAX 402-437-8558

**WOODS & AITKEN**  
L \* L \* P

DENVER OFFICE  
SUITE 525  
8055 EAST TUFTS AVENUE  
DENVER, COLORADO 80237-2835  
TELEPHONE 303-606-6700  
FAX 303-606-6701

OMAHA OFFICE  
SUITE 525  
10250 REGENCY CIRCLE  
OMAHA, NEBRASKA 68114-3754  
TELEPHONE 402-898-7400  
FAX 402-898-7401

THOMAS J. MOORMAN  
DIRECT: (202) 944-9502  
EMAIL: TMOORMAN@WOODSAITKEN.COM  
WWW.WOODSAITKEN.COM  
*ADMITTED TO PRACTICE ONLY IN THE DISTRICT OF COLUMBIA*

WASHINGTON OFFICE  
SUITE 310  
5151 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016-4124  
TELEPHONE 202-944-9500  
FAX 202-944-9501

PLEASE RESPOND TO WASHINGTON ADDRESS

February 26, 2019

***VIA ECFS***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

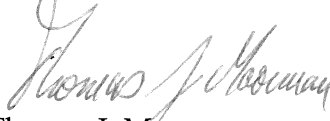
**Re: EB Docket No. 06-36  
Section 64.2009(e) CPNI Certification  
Ligonier Telephone Company, Inc. (Form 499-A Filer ID No. 801087)**

Dear Ms. Dortch:

Attached for filing is the Section 64.2009(e) Customer Proprietary Network Information certification and accompanying statement covering the prior calendar year 2018 of Ligonier Telephone Company, Inc. (Form 499-A Filer ID No. 801087).

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,

  
Thomas J. Moorman

Attachments

**Annual 47 CFR § 64.2009(e) CPNI Certification Template**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: 2/26/2019
2. Name of company(s) covered by this certification: Ligonier Telephone Company, Inc.
3. Form 499 Filer ID: 801087
4. Name of signatory: Randy Mead
5. Title of signatory: Executive Vice President/General Manager
6. Certification:

I, Randy Mead, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed \_\_\_\_\_

**Attachments:**      Accompanying Statement explaining CPNI procedures

## **Ligonier Telephone Company, Inc.**

### **Attachment: Accompanying Statement of Operating Procedures**

Per the FCC CPNI rules [C.F.R. § 64.2009(e)] and as referenced in the attached signed certification, Ligonier Telephone Company, Inc., herein referenced as the Company, hereby certifies that the Company is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below that have been adopted and are followed by the Company in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI manual has been reviewed to ensure it is up to date in order to account for all FCC CPNI rules and has been adopted by our Company's board.
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity.
3. CPNI was not utilized for marketing purposes, however if the Company should decide to utilize CPNI marketing in the future, the following is in place and will be utilized:
  - a. Established an outbound marketing supervisory review process for the use of CPNI; and
  - b. Records will be maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year.
4. Opt-out method for approval of CPNI use for marketing campaigns is in place, in case CPNI marketing is utilized in the future:
  - a. Customers are notified annually of their rights for the use of their CPNI in marketing campaigns;
  - b. New customers are notified of the opt-out procedures as a part of the customer sign-up process;
  - c. Billing system clearly displays customer's opting status; and
  - d. Compliance officer retains CPNI notifications and opting records for at least two years.
5. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI.
  - a. A Disciplinary process has been defined and is in place for violations and/or breaches of CPNI.
6. Carrier authentication requirements have been met.
  - a. All customers during a customer-initiated telephone calls are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC.
  - b. Call detail is only released to customers during customer-initiated telephone contact using the following FCC approved methods which are permitted for the release of the requested call detail:
    - i. Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days);
    - ii. Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact); and
    - iii. Having customer come in to the Company's office and provide a valid government issued photo ID.
7. Online CPNI access requirements have been met.

- a. Customers are authenticated without the use of readily available biographical information or account information prior to being allowed online access to the service account.
  - b. Once authenticated, the customer may only obtain online access to CPNI related to the service account through a password, which is not prompted by readily available biographical or account information.
  - c. If multiple unsuccessful attempts are made to access the online account, the customer will become locked out of the system and need to contact the Company in order to be re-authenticated and be able to reset a new password.
8. We provide immediate notice to customer of particular account changes.
9. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC.
10. Additional protection measures are taken above and beyond the current FCC CPNI rules.
  - a. The Company takes reasonable measures to discover and protect against activity that is indicative of pretexting.
  - b. The Company maintains security of all CPNI, including but not limited to:
    - i. Documents containing CPNI are shredded; and
    - ii. Computer terminals are locked when employee is not at their station.